



U.S. Department of Justice

United States Attorney  
Southern District of New York

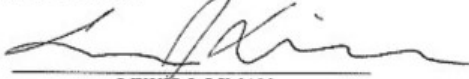
The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

July 6, 2020

Hon. Lewis J. Liman  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, NY 10007

7/7/2020

SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

Re: **United States v. Isaam Henry, 20 Cr. 293 (LJL)**

Dear Judge Liman:

With consent of defense counsel, Scott Tulman, Esq., the Government seeks an adjournment of the July 7 deadline to respond to defendant's letter seeking certain records relating to the selection of the grand jury that returned the Indictment in this case. As the Court may be aware, similar requests are pending in numerous cases in this District. On June 30, 2020 in the case of *United States v. Balde*, 20 Cr. 281 (KPF), Judge Failla presided over a conference call with the Jury Administrator for the Southern District of New York, Linda Thomas. Counsel for the Government and the defendant in this case were invited to and did participate in the call. During that call, Ms. Thomas provided additional information about the existence and form of documents responsive to the defendant's requests. Judge Failla has ordered the parties in *Balde* to meet and confer about whether there is any dispute as to which documents requested by the defense counsel should be produced, and to submit a joint status letter no later than July 14. Because the document requests in this case are identical to those in *Balde*, the Government believes that any agreement reached in that case is likely to moot much, if not all, of any dispute in this case. Accordingly, the parties request that the Court extend the current deadly to July 21, at which time the parties can notify the Court whether there is any dispute regarding the defendant's document requests.

Respectfully,

AUDREY STRAUSS  
Acting United States Attorney

by: \_\_\_\_\_/s/ Thomas Burnett\_\_\_\_\_  
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